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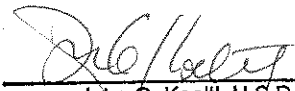
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August 7, 2024

BY ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

8/8/24

John G. Koeltl, U.S.D.J.

Re: *Kingdom of Belgium, Federal Public Service Finance Pension Plan Litigation.*
Lead Case: No. 21 Civ. 6392 (JGK)
Member Cases: Nos. 21 Civ. 6392 (JGK), 21 Civ. 6399 (JGK), 21 Civ. 6402 (JGK), 21 Civ. 6404 (JGK), 21 Civ. 6405 (JGK), 21 Civ. 6407 (JGK), 21 Civ. 6408 (JGK)

Dear Judge Koeltl:

We write pursuant to Section 1.E of Your Honor's Individual Practices, on behalf of all defendants and with the consent of all parties, to request extensions to certain deadlines set forth in the Rule 26(f) Report approved by the Court on August 7, 2023 (the "August 7 Order"), as modified by the Court on January 4, 2024 (the "January 4 Order"), April 12, 2024 (the "April 12 Order"), and July 12, 2024 (the "July 12 Order").

Under the August 7 Order, as modified by the January 4 Order, the April 12 Order, and the July 12 Order, the Court approved an initial expedited discovery schedule relating to the statute of limitations defense, to be followed by briefing on a limited consolidated summary judgment motion on the statute of limitations, general discovery, contention interrogatories, expert discovery, other dispositive motions, and a pre-trial order.

Due in part to the recent appearance of new defense counsel, as well as other defense counsels' upcoming trial schedules, the parties have agreed to the revised schedule below, which extends all remaining discovery deadlines, the deadlines for summary judgment briefing on the statute of limitations, the deadline for dispositive motions, and the deadline for the pretrial order in the event there are no dispositive motions by eight weeks.

Description	Proposed Deadline
Limited Consolidated Summary Judgment Motion on Statute of Limitations Issues	August 30, 2024
Opposition to Summary Judgment Motion on Statute of Limitations Issues	October 4, 2024
Reply on Statute of Limitations Issues	October 25, 2024
Completion of General Document Production (by Parties)	October 4, 2024
Contention Interrogatories pursuant to Local Civil Rule 33.3 may be served	November 4, 2024
Meet-and-confer on Topics for Expert Discovery	February 18, 2025
Fact Discovery Cut-Off	March 21, 2025
Expert Reports by Party with Burden	May 19, 2025
Rebuttal Expert Reports	June 20, 2025
Expert Discovery Cut-Off	August 12, 2025
Dispositive Motions	September 9, 2025
Pretrial Order	45 days from date of decision on any dispositive motion (or September 22, 2025, if there is no such motion)

For the reasons set forth above, we respectfully request that the Court approve these modifications to the schedule. This is the fourth request for extensions of the deadlines in the August 7 Order.

Respectfully submitted,

/s/ Julie E. Fink

Julie E. Fink